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December 15, 2017

Dharam Singh
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Jerry Bovee
Source Test Section Manager
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

*RE: New Shredder Particulate Abatement System - Schnitzer Steel Products Company, Oakland, California
(Plant No. 208) – Submission of Source Test Report*

Dear Mr. Singh:

On behalf of Schnitzer Steel Products Company (Schnitzer Steel), Trinity Consultants (Trinity) is submitting the report for source tests conducted on October 12-13, 2017, in compliance with the requirements of Condition 26401, Application No. 27762. The POC results are reported as "TBD" as we are still working with the test contractor, Montrose Air Quality Services, and their laboratory, to ensure that a proper Quality Assurance/Quality Control procedure was completed for the POC data and that such data is accurately reported. We will transmit the POC results as soon as these questions are resolved.

As noted in our October 10 letter, Schnitzer Steel had intended to use this additional test data to better formulate the emission and process rate limits required by Condition 26401, Part 3. However, given the uncertainty regarding the POC test results, as well as questions regarding measurements of some of the toxic air contaminants, Schnitzer Steel is planning a third set of tests in mid-January. A revised test protocol will be provided to the District in advance of the test date.

On October 11, 2017, the District approved Schnitzer's request to extend the deadline for submitting the letter required by the Condition 26401, Part 3 to within 90 days of receiving the October 2017 source test results. Schnitzer received the October 2017 source test report on December 15, making this deadline March 15, 2018. While we may be able to obtain the results of the January 2018 retests in time to meet this deadline, we are requesting a further 45 day extension, to May 30, 2018, for submission of the required letter. We would be pleased to schedule a meeting with District staff early in January to discuss the reasons for the additional testing and the request for the further extension.

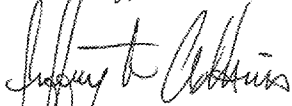
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Should you have any questions or require additional information related to this request, please contact me at (916) 273-5127.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Adkins". The signature is fluid and cursive, with the first name "Jeffrey" and last name "Adkins" clearly distinguishable.

Jeffrey Adkins
Principal Consultant

Attachment

cc: Carol Allen, BAAQMD
Scott Sloan, Schnitzer Steel
Daniel Lee, Schnitzer Steel
Rob Ellsworth, Schnitzer Steel